



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

September 4, 2002

Dirk Kempthorne, Governor
C. Stephen Allred, Director

CERTIFIED MAIL NO. 7000 1670 0013 9128 7819

Burl Ackerman
Environmental Manager
J. R. Simplot
P. O. Box 9069
Nampa, ID 83652

RE: AIRS Facility No. 027-00059, J. R. Simplot, Nampa Potato Plant
Final Tier II Operating Permit and Permit to Construct

Dear Mr. Ackerman:

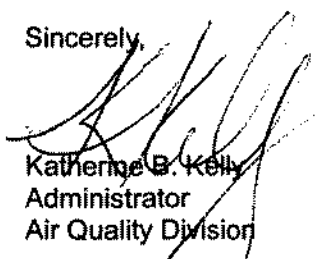
The Department of Environmental Quality (Department) is issuing Tier II Operating Permit and Permit to Construct No. 027-00059 for the J. R. Simplot facility in Nampa in accordance with *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.400 through 470 and 58.01.01.200-228, respectively.

The enclosed permit is based on the information contained in your permit application and the relevant comments received during the public comment period. This permit is effective immediately. Modification to and/or renewal of this permit shall be requested in a timely manner in accordance with the *Rules*.

Matt Stoll of the Boise Regional Office will contact you regarding a meeting with the Department to discuss the permit terms and requirements. In addition to your facility's plant manager, the Department recommends the following representatives attend the meeting: your responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with the permit conditions.

You, as well as any other entity, may have the right to appeal this final agency action pursuant to IDAPA 58.01.23, *Rules of Administrative Procedure Before the Board of Environmental Quality*. A petition may be filed with the Hearings Coordinator, Department of Environmental Quality, 1410 N. Hilton, Boise, ID 83706-1255, within 35 days of the date of this decision. However, prior to filing a petition for a contested case, the Department encourages you to contact Mike Simon at (208) 373-0502 to discuss any concerns you may have with the enclosed permit.

Sincerely,


Katherine B. Kelly
Administrator
Air Quality Division

KK/KB/tk Project No. T2-010032

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Enclosure

cc: Joan Lechtenberg, Air Quality Division
Kent Berry, EQM

Laurie Kral, EPA - Region 10
Matt Stoll, Boise Regional Office



Air Quality
TIER II OPERATING PERMIT
and
PERMIT TO CONSTRUCT

State of Idaho
Department of Environmental Quality

PERMIT NO: 027-00059
AQCR: 64 **CLASS:** SM
SIC: 2037 **ZONE:** 11
UTM COORDINATE (km): 531.7 , 4828.8

1. PERMITTEE

J. R. Simplot – Food Group

2. PROJECT

Tier II Operating Permit and Permit to Construct

3. MAILING ADDRESS

P. O. Box 9069

CITY

Nampa

STATE

ID

ZIP

83652

4. FACILITY CONTACT

Burl Ackerman

TITLE

Environmental Manager

TELEPHONE

208-442-4048

5. RESPONSIBLE OFFICIAL

Dale Baker

TITLE

Unit Director

TELEPHONE

208-466-8911

6. EXACT PLANT LOCATION

3704 North Middleton Road

COUNTY

Canyon

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Frozen Potato Processor

8. PERMIT AUTHORITY

This permit is issued according to the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.400-470. and IDAPA 58.01.01.200-228. This permit pertains only to emissions of air contaminants, which are regulated by the state of Idaho and to the sources specifically allowed to be operated by this permit.

This permit is not transferable to another person, place, or piece or set of equipment. This permit will expire if construction has not yet begun within two years of its issue date or if construction is suspended for one year.

This permit has been granted on the basis of design information presented in the application and the Idaho Department of Environmental Quality's technical analysis of the supplied information. Changes in design or equipment that result in any change in the nature or amount of emissions may be considered a modification. Modifications are subject to Department review in accordance with IDAPA 58.01.01.200 of the *Rules for the Control of Air Pollution in Idaho*.


KATHERINE B. KELLY, ADMINISTRATOR, AIR QUALITY DIVISION
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED: September 4, 2002

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ACRONYMS, UNITS AND CHEMICAL NOMENCLATURE

AIRS	Aerometric Information Retrieval Subsystem
AFS	AIRS Facility Subsystem
AQCR	Air Quality Control Region
CFR	Code of Federal Regulations
CO	Carbon Monoxide
EPA	United States Environmental Protection Agency
gr	Grains (1 lb = 7000 grains)
H ₂ S	Hydrogen Sulfide
IDAPA	A numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	Kilometer
lb/hr	Pound Per Hour
M	Thousand
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
PM ₁₀	Particulate Matter with an Aerodynamic Diameter of 10 Micrometers or Less
PTC	Permit To Construct
SCFM	Standard Cubic Feet Per Minute
SIC	Standard Industrial Classification Code
SM	Synthetic Minor
SO ₂	Sulfur Dioxide
T/yr	Tons Per Year
µm	Micrometers
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT No. 027-00059

Permittee: J. R. Simplot - Food Group
Location: Nampa, Idaho

Date Issued: September 4, 2002
Date Expires:

1. PERMIT SCOPE***Purpose***

- 1.1 The purpose of this permit is to renew and change the permittee name for Tier II Permit No. 027-00059, issued January 3, 1996, incorporate an existing PTC, and issue a new PTC for the anaerobic digester.
- 1.2 This permit incorporates and replaces the following permits:
- Tier II No. 027-00059, issued January 3, 1996 to Nestle Brands
 - PTC No. 027-00059, issued December 15, 2000 to J.R. Simplot

Regulated Sources

- 1.3 Table 1.1 below lists all sources of emissions that are regulated in this permit.

Table 1.1 Regulated Emission Sources

Permit Sections	Source Description	Emission Controls
3	Nebraska MS-E-66 gas-fired boiler, 99.8 MM Btu/hr, installed 2001 Cleaver Brooks NS-F-84 gas-fired boiler, 70 MM Btu/hr Nine gas-fired make up air heaters, < 10 MM Btu/hr each	Todd-Lo-NO _x Variflame burner None None
4	Main Line Dryer (gas-fired), National Drying, 1987 Cam, 21 MM Btu/hr Main Line Fryer, Heat and Control, FF6029-5-I-3F Specialty Line Dryer/Cooler, Proctor Schwartz, K21761 Specialty Line Fryer, Gem Equipment, 1700	None None None None
5	Anaerobic digester and 4.95 MM Btu/hr Cleaver Brooks boiler, Model 700-350-160	Flare, Varec Model 244W

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Permittee: J. R. Simplot - Food Group
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Date Issued: September 4, 2002
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2. FACILITY-WIDE CONDITIONS

- 2.1 All reasonable precautions shall be taken to prevent particulate matter (PM) from becoming airborne in accordance with IDAPA 58.01.01.650-651.

[IDAPA 58.01.01.650-651, 5/1/94]

Odors

- 2.2 No person shall allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution as required in IDAPA 58.01.01.775-776.

[IDAPA 58.01.01.775-776, 5/1/94]

- 2.3 The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall, at a minimum, include the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

[IDAPA 58.01.01.211.01]

Visible Emissions

- 2.4 No person shall discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which has greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, nitrogen oxides, and/or chlorine gas is the only reason(s) for the failure of the emission to comply with the requirements of this section.

[IDAPA 58.01.01.625, 5/1/94]

Excess Emissions

- 2.5 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets and breakdowns.

[IDAPA 58.01.01.130-136]

Reports and Certifications

- 2.6 Any reporting required by this permit, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certifications, shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete. Any reporting required by this permit shall be submitted to the following address:

Air Quality Permit Compliance
Department of Environmental Quality
Boise Regional Office
1445 N. Orchard
Boise, Idaho 83706-2239

[IDAPA 58.01.01.405.01, 5/1/94]

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Open Burning

- 2.7 The permittee shall comply with the requirements of IDAPA 58.01.01.600-616, *Rules for Control of Open Burning*.

[IDAPA 58.01.01.600-616, 5/1/94]

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3. NATURAL GAS COMBUSTION EQUIPMENT**3.1 Process Description**

The primary purpose of the Nebraska and Cleaver Brooks boilers is generating process steam. The air makeup heaters provide space heat for the plant.

3.2 Control Description

Emissions from the natural gas combustion sources are uncontrolled.

Emission Limits**3.3 Particulate Matter Emissions**

The permittee shall not discharge to the atmosphere from any fuel-burning equipment particulate matter in excess of 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume for gas.

[IDAPA 58.01.01.676-677, 5/1/94]

3.4 Emissions Limits

Emissions of PM, PM₁₀, NO_x, and CO from the natural gas combustion equipment shall not exceed any corresponding emissions rate limits listed in the following table.

[IDAPA 58.01.01.405, 5/1/94; PTC No. 027-00059, 12/15/00]

Table 3.1 Natural Gas Combustion Equipment Emissions Limits

Source Description	PM/PM ₁₀		NO _x		CO	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Cleaver Brooks boiler	0.5	2.25	6.8	29.7	5.7	24.9
Nebraska boiler	0.7	3.21	4.3	18.8	8.1	35.5
Air make-up units			3.6	15.8		

Operating Requirements**3.5 Fuel**

The permittee shall combust natural gas exclusively in the Nebraska and Cleaver Brooks boilers..

[IDAPA 58.01.01.405, 5/1/94]

Monitoring and Recordkeeping**3.6 NSPS Fuel Consumption**

The permittee shall monitor and record the amount of natural gas burned in the Nebraska boiler on a daily basis.

[40 CFR 60.48c(g)]

AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT No. 027-00059

Permittee: J. R. Simplot - Food Group
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Date Issued: September 4, 2002
Date Expires:

4. PROCESS EQUIPMENT

4.1 Process Description

The processes covered by this section of this permit are the main line and the specialty line. The air pollutant-emitting operations are the drying and frying of potatoes.

4.2 Control Description

These operations are uncontrolled.

Emission Limits

4.3 Emission Limits

Emissions from the process equipment shall not exceed the following emission rates:

PM/PM₁₀ – 70.9 T/yr; NO_x – 8.9 T/yr; and VOC-55 T/yr.

[IDAPA 58.01.01.405, 5/1/94]

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Permittee: J. R. Simplot - Food Group
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Date Issued: September 4, 2002
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5. ANAEROBIC DIGESTION EQUIPMENT**5.1 Process Description**

The primary purpose of the emissions unit is to burn the offgases, which contain H₂S, released from anaerobic digesters that treat wastewater from the potato processing operations. The offgases are burned in a boiler and/or a flare.

5.2 Control Description

Emissions from the offgas combustion are uncontrolled.

Emission Limits**5.3 Emission Limits**

The SO₂ emissions from combustion of offgases from the anaerobic digester boiler and flare shall not exceed 26.9 T/yr in any consecutive 12-month period.

[IDAPD 58.01.01.211.01, 5/1/94]

Operating Requirements**5.4 Pilot Flame and Alarm System on Flare**

The flare shall be operated with a pilot flame present during the operation of the compressors. The permittee shall install an alarm system on the flare to notify operating personnel in case of a flare flame-out. The flare shall be reignited as expeditiously as practicable. The permittee shall maintain records of the time and duration of all flame-out periods onsite for a period of 5 years.

[IDAPA 58.01.01.211.01, 5/1/94]

Monitoring and Recordkeeping Requirements**5.5 Biogas Flow and H₂S Concentrations Monitoring**

The permittee shall install, calibrate, and operate a biogas flow meter and an H₂S gas monitor that shall be placed after the outlet of the anaerobic digester.

The permittee shall monitor and record the biogas flow and the H₂S concentrations in weekly basis. The most recent five years' compilation of data shall be kept onsite and shall be made available to Department representatives upon request.

The permittee shall use the biogas flow rate and the H₂S concentrations results to calculate the annual SO₂ emissions from the biogas flares. This information shall be maintained onsite at all times and shall be made available to Department representatives upon request.

[IDAPA 58.01.01.211.01, 5/1/94]

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Permittee: J. R. Simplot - Food Group
Location: Nampa, Idaho

Date Issued: September 4, 2002
Date Expires:

Reporting Requirements

5.6 Flame-outs and Odor Complaints

The permittee shall submit semi-annual reports to the Department by January 15 and July 15 of each year summarizing the occurrences of flare flame-outs and odor complaints and corrective actions taken during the period.

[IDAPA 58.01.01.211.01]

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6. SUMMARY OF EMISSION RATE LIMITS

The following table provides a summary of all emission rate limits required by this permit.

Table 6.1 SUMMARY OF ALL EMISSION RATE LIMITS

J.R. Simplot - Food Group, Nampa										
Emission Limits^a - Hourly (lb/hr), and Annual^b (T/yr)										
Source Description	PM₁₀^c		NO_x		CO		VOC		SO₂	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Cleaver Brooks boiler	0.5	2.25	6.8	29.7	5.7	24.9				
Nebraska boiler	0.7	3.21	4.3	18.8	8.1	35.5				
Air make-up units			3.6	15.8						
Process equipment		70.9		8.9				55.0		
Anaerobic digestion equipment										26.9

^aAs determined by a pollutant-specific EPA reference method, a Department-approved alternative, or as determined by the Department's emissions estimation methods used in this permit analysis.

^bAs determined by multiplying the actual or allowable (if actual is not available) pound per hour emission rate by the allowable hours per year that the process(es) may operate(s), or by actual annual production rates.

^cincludes condensibles.

AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT No. 027-00059

Permittee: J. R. Simplot - Food Group
Location: Nampa, Idaho

Date Issued: September 4, 2002
Date Expires:

7. FACILITY-WIDE EMISSIONS INVENTORY

The following table provides a summary of the emissions inventory of the facility based on potential to emit. The emissions inventory table is provided for informational purposes only.

Table 7.1 Emission Inventory Based on PTE

J.R. Simplot – Food Group – Nampa Potential Emissions* Annual (T/yr)					
Source Description	PM₁₀ T/yr	NO_x T/yr	CO T/yr	VOC T/yr	SO₂ T/yr
Cleaver Brooks boiler	2.25	29.7	24.9	1.63	0.18
Nebraska boiler	3.21	18.8	35.5	2.33	0.25
Air make-up units	1.20	15.8	13.2	0.9	0.09
Process equipment	70.9	8.9	7.47	55.0	0.05
Anaerobic digester flare and boiler	0.24	3.14	2.63	0.16	26.9
Total	77.8	76.3	83.7	60.0	27.5

*As determined by a pollutant-specific EPA reference method, a Department-approved alternative, or as determined by the Department's emissions estimation methods used in this permit analysis.

AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT No. 027-00059

Permittee: J. R. Simplot - Food Group
Location: Nampa, Idaho

Date Issued: September 4, 2002
Date Expires:

8. GENERAL PROVISIONS

1. All emissions authorized herein shall be consistent with the terms and conditions of this permit. The emission of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the *Rules for the Control of Air Pollution in Idaho*, and the Environmental Protection and Health Act, Idaho Code 39-101 et seq.
2. The permittee shall at all times (except as provided in the *Rules for the Control of Air Pollution in Idaho*) maintain and operate in good working order all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable laws for the control of air pollution.
3. The permittee shall allow the Director, and/or his authorized representative(s), upon the presentation of credentials:
 - To enter upon the permittee's premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit; and
 - At reasonable times, to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and to require stack emissions testing (i.e., performance tests) in conformance with state-approved or accepted EPA procedures when deemed appropriate by the Director.
4. Except for data determined to be confidential under Section 9-342A *Idaho Code*, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the appropriate regional office of the Department of Environmental Quality.
5. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
6. In the event of any change in control or ownership of source(s) from which the authorized emissions emanate, the permittee shall notify the succeeding owner or controller of the existence of this permit by letter; a copy of which shall be forwarded to the Director.
7. This permit shall be renewable on the expiration date, provided the permittee submits any and all information necessary for the Director to determine the amount and type of air pollutants emitted from the equipment for which this permit is granted. Failure to submit such information within 60 days after receipt of the Director's request shall cause the permit to become void.
8. The Director may require the permittee to develop a list of operation and maintenance procedures to be approved by the Department. Such list of procedures shall become a part of this permit by reference, and the permittee shall adhere to all of the operation and maintenance procedures contained therein.
9. The provisions of this permit are severable; and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.